

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GETRONICSWANG CO., LLC,

Plaintiff,

v.

HYNIX SEMICONDUCTOR, INC. and
SAMSUNG ELECTRONICS CO., LTD.

Defendants.

Civil Action No. 04-12382 (RCL)

AFFIDAVIT OF SUNGRAK SON

Sungrak Son, being duly sworn, deposes and states as follows:

1. My name is Sungrak Son. I am a lawyer in the legal department at Samsung Electronics Co., Ltd. (Samsung"). I have been employed by Samsung since July 16, 1999.
2. I received from our counsel in this matter a copy of the deposition notice served by GetronicsWang Co., LLC pursuant to Fed. R. Civ. P. 30(b)(6).
3. After making diligent inquiries at Samsung, I have not been able to identify anyone currently employed by Samsung who has any personal knowledge of the withholding of taxes from royalty payments made to Wang under Samsung's SIMMS licensing agreement with Wang in the period 1992 to 1995. In particular, I have not been able to identify anyone who was involved in the decision to withhold the taxes or who has knowledge of why the decision to withhold was made or of any objections Wang may have made to such withholding. Indeed, I have not been able to identify anyone who has any recollection of being involved in any discussions concerning the withholding of taxes from the royalty payments to Wang.

A handwritten signature in black ink, reading "Sungrak Son". The signature is written in a cursive, flowing style. The first letter "S" is large and loops around the rest of the name. The "Son" part is also cursive and connected to the first part.

Sungrak Son